

REMARKS

Applicants wish to express their sincere appreciation for the time that Examiner Leon spent preparing for the scheduled interview with Applicant's representative on April 16, 2003. Unfortunately, the Examiner had to cancel the interview and was unable to re-schedule. The Examiner notified Applicant's representative that he would consider the issues that were brought to his attention on April 3, 2003 and any addition remarks. Therefore, these issues, which are outstanding in the present application, are discussed below.

Furthermore, the Examiner indicated that he would re-consider his position on the final rejection. Applicants earnestly request that the final rejection be withdrawn in light of the fact that the final rejection includes new grounds of rejection. In this respect, since Applicants have not been given the opportunity as of yet to response to the new grounds of rejection, it is requested that the following remarks be carefully considered and that the final rejection and all other rejections be withdrawn.

Response to 35 U.S.C. §103 Rejection

Claims 1-5, 7, 9, and 22 stand rejected under 35 U.S.C. §103 as allegedly being unpatentable over *Pepe* (U.S. Patent No. 5,836,786). Applicants respectfully traverse this rejection on the grounds that *Pepe* does not teach or suggest, implicitly or explicitly, all the elements of the pending claims. It is well established at law that, for a proper rejection of a claim under 35 U.S.C. §103 as being obvious based upon a single reference, the reference must disclose, teach, or suggest, either implicitly or explicitly, all elements/features/steps of the claim at issue. *See, e.g., In Re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

In order to make a proper *prima facie* case of obviousness, three basic criteria must be met, as set forth in MPEP 706.02(j). First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references, when combined, must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable

expectation of success must both be found in the prior art and not based on Applicant's disclosure. See MPEP 706.02(j).

Applicants assert that none of the three criteria have been met to establish a *prima facie* case of obviousness. First, *Pepe* does not teach or suggest all the claim limitations, as mentioned above. Secondly, there is no suggestion or motivation in the prior art to modify *Pepe* or to combine claim elements that are lacking from *Pepe* into the device of *Pepe*. And lastly, there is not a reasonable expectation of success for altering *Pepe* found in the prior art without substantial changes from the intended direction in which *Pepe* is leading. For at least the reasons stated above, it is respectfully requested that the Examiner kindly withdraw the rejection of claim 1.

Claim 1:

Pepe fails to teach or suggest ***“each sub-panel cut-out having two sub-panel slots”*** as claimed in claim 1. Instead, *Pepe* discloses apertures 12, but fails to suggest that each aperture includes two sub-panel slots as claimed. It should be understood that each of the claimed slots is capable of receiving a respective sub-panel, whereby two sub-panels are connectable across each sub-panel cut-outs.

Pepe also fails to teach or suggest a main panel including ***“a pair of attachment elements located adjacent to each of the sub-panel slots”*** as claimed. In this respect, claim 1 includes a “plurality” of sub-panel cut-outs, each sub-panel cut-out having “two” sub-panel slots, and a “pair” of attachment elements adjacent to each sub-panel slot. Therefore, as claimed, there are at least two sub-panel cut-outs, at least four sub-panel slots, and at least eight attachment elements. *Pepe* fails to teach or suggest such a configuration.

Pepe fails to further teach or suggest ***“the attachment elements of each pair [of attachment elements] positioned on opposite sides of the respective sub-panel slot”*** as claimed. *Pepe* instead teaches an interior edge of the aperture 12 but does not include a pair of attachment elements on opposite sides of each sub-panel slot. Since claim 1 includes that there are two sub-panel slots per sub-panel cut-out, and a pair of attachment elements per sub-panel slot, it can be deducted that claim 1 includes four attachment elements per sub-panel cut-out. *Pepe*, on the other hand, includes only one or two at most.

Pepe further fails to teach or suggest that ***“each sub-panel spans across a respective sub-panel slot”*** as claimed. Instead, *Pepe* includes an interface housing 20 that is inserted into the aperture. The interface housing 20 does not span across one of two slots of a sub-panel cut-out. With the interface housing 20 of *Pepe* filling the entire aperture, no space is left for a second interface housing, nor is there room for the claimed sub-panels that span across the sub-panel slot.

Claims 2-5, 7, 9, and 22:

Dependent claims 2-5, 7, 9, and 22 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 1. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

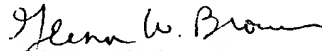
Claims 10 and 11:

Claims 10 and 11 stand rejected under 35 U.S.C. §103 as allegedly being unpatentable over *Pepe* in view of *Daoud* (U.S. Patent No. 6,139,356). Applicants respectfully traverse this rejection on the grounds that *Daoud* does not overcome the deficiencies of *Pepe* with respect to independent claim 1. More specifically, *Daoud* does not teach or suggest, alone or in combination with *Pepe*, all the claimed elements of claim 1. For instance, *Daoud*, like *Pepe*, fails to teach or suggest ***“each sub-panel cut-out having two sub-panel slots,” “a pair of attachment elements located adjacent to each of the sub-panel slots,” “the attachment elements of each pair [of attachment elements] positioned on opposite sides of the respective sub-panel slot,”*** and that ***“each sub-panel spans across a respective sub-panel slot”*** as claimed in claim 1. For at least these reasons, Applicants respectfully request that the Examiner withdraw the rejection of claims 10 and 11.

CONCLUSION

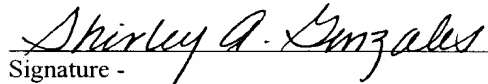
For at least the reasons set forth above, Applicants respectfully submit that all rejections have been traversed, and that pending claims 1-5, 7, 9-11, and 22 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,


Glenn W. Brown
Reg. No. 51,310

**THOMAS, KAYDEN,
HORSTEMEYER & RISLEY, L.L.P.**
Suite 1750
100 Galleria Parkway N.W.
Atlanta, Georgia 30339
(770) 933-9500

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Commissioner for Patents, Washington D.C. 20231, on April 28,
2003.


Signature -